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Date: December 7, 2015
To: FCC-WEA
From: Norm Sturm, Cochise County, AZ
Subject: Proposed WEA Changes

I am providing comment on several key components of the proposed changes/improvements to the Wireless Emergency Alerts (WEA) and Community-Initiated Alerting. Specifically:

- FCC proposes expanding the WEA message length from 90 to 360 characters
 - I believe that expanding the WEA messaging capability from 90 to 360 characters will allow for more useful and detailed alerting during emergency events.
 - As WEA may be the only information received by some members of the public, it is essential to be able to convey concise (yet complete) information and/or instructions.
 - I believe that 360 characters should strike a balance between concise and complete messages. For emergency messaging brevity is important...but so are understandable messages .
- FCC proposes adding a new WEA category titled "Emergency Government Information" for non-emergency type messages (i.e. boil water, shelter locations)
 - The proposed category of Emergency Government Information should be limited to actionable messaging that directly affects the immediate health and welfare of a geographically defined population. Examples of this type of messaging may include boil orders, shelter locations, or neighborhood pre-evacuation notices.
 - General "safety" messaging should not be included. Examples of general safety messaging may include: area fire restrictions, road closures, seasonal hazard notices, etc.
 - While they may be used in conjunction with higher-level threat messaging, Emergency Government Information should be available as a stand-alone messaging option
 - Like other WEA messages, this should be an "opt-out" option.
 - To prevent public desensitization, the use of any WEA-related products should be tightly controlled and initiated by appropriate public safety agencies. My suggestion would be County-level emergency management and/or sheriff's office.

- FCC proposes allowing URLs and telephone numbers in WEA messages which were previously prohibited
 - URLs and phone numbers for more in-depth information can be a useful tool in WEA messages. I encourage the option for URLs and phone numbers in WEA messages.
- FCC proposes including multilingual WEA messages.
 - In my opinion, multilingual WEA messages may be problematic as many smaller jurisdictions do not have immediate multilingual capabilities...especially for more diverse languages.
 - Inclusion of multilingual messaging will most-likely set a best practice standard and expose many local users to litigation risk if they cannot accommodate all local dialects. This exposure could result in a reluctance to use WEA.
- FCC proposes improvements to WEA geo-targeting of alerts
 - Being able to target polygon-defined areas would be extremely helpful. In Arizona (as well as most other western states) many counties are 5000 to 18000 square miles. County-level WEA is problematic.
 - Bringing WEA to the cell-site level would be extremely helpful to prevent public alert fatigue.
- FCC proposes inclusion of local WEA test codes
 - Monthly testing should be a local option.
 - Test codes should be an opt-in for the general public.
- FCC proposes requiring cell carriers to log alerts and provide reports
 - I am very hesitant to suggest that carriers be required to collect and report alerting data. Especially if this would become a costly endeavor. Except for special post-use circumstances, the data would not be generally useful to most local public safety agencies.

In summary, I am supportive of expanding the capabilities and use of WEA-related products. I believe great care needs to be taken to protect the judicious use of WEA capabilities. Generally, I believe that county-level initiation of WEA alerts provides a good balance of accessibility and accountability. Please feel free to contact me anytime if I can be of assistance.

Norman A. Sturm Jr., MS, CEM

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